

## REMARKS

Claims 1-20 remain pending in this application.

The Examiner rejected claims 1-3 under 35 U.S.C. § 102(a) as being anticipated by U.S. Patent No. 5,529,831 (*Waga*). Applicants respectfully traverse this rejection.

In the Final Office Action dated September 02, 2003, the Examiner asserted that although *Waga* does not mention electro-static discharge (ESD) devices, the capacitors 26 in *Waga* anticipates the ESD devices in the claims of the present invention. Applicants respectfully disagree. *Waga* does not disclose or suggest any devices directed toward discharge of electro-static energy. The apparatus with the reference number “26” in *Waga* is a dielectric layer 26 in a thin film device 21 (see col. 8, lines 1-15 and Figure 9). The thin film device 21 serves a “distributed constant-type L-C device” (see col. 8, lines 27-28). In contrary to the Examiner’s assertions, Applicants respectfully assert *Waga* does not disclose a capacitor that may be used to anticipate an ESD device. *Waga* does not even mention a capacitor 26; additionally, *Waga* does not mention, disclose, or suggest a capacitor that may be used to anticipate an ESD clamp. Merely providing an L-C circuit will not anticipate an ESD clamp called for by claim 1 of the present invention. Additionally, *Waga* does not disclose any devices that have a parasitic capacitance, which is called for by claim 1 of the present invention (*e.g.*, claims 1 and 18 calls for an ESD clamp having a parasitic capacitance). Therefore, *Waga* cannot, and does not, teach, anticipate, or suggest all of the elements of independent claims 1 and 18.

*Waga* is directed to a thin film device 21 that includes a magnetic substrate and spiral coils. The L-C filter provided by *Waga* (see Figure 10) is directed towards eliminating noise in input signals (see col. 8, lines 26-33). However, the circuitry provided by *Waga* does not provide for electro-static discharge (ESD) protection. *Waga* does not disclose a plurality of ESD clamp devices, as called for claims 1 and 18 of the present invention. Merely providing the L-C filter (Figure 10) and a coil (Figure 11) would not teach the plurality of ESD clamp devices having a parasitic capacitance, which is not even mentioned by *Waga*. *Waga* merely provides a thin film equivalent circuit that provides a L-C filter to eliminate noise, it does not provide a plurality of ESD clamp devices having parasitic capacitance (see col. 4, line 64-col 5, line 3; col. 8, lines 27-47). *Waga* does not disclose connecting ESD clamp devices (that have parasitic capacitances) to a corresponding turn of a plurality of turns of an inductor, as called for by claims of the present invention. Therefore, *Waga* does not teach all of the elements called for by independent claims 1 and 18 of the present invention.

Independent claims 1 and 18 are allowable for at least the reasons cited above. Additionally, claims 2-17 and 19-20, which depend from independent claims 1 and 18, respectively are also allowable for at least the reasons cited above.

The Examiner rejected claims 1-20 are rejected under 35 U.S.C. § 102(a) as being anticipated by U.S. Patent No. 5,831,331 (*Lee*) or, in the alternative, under 35 U.S.C. § 103(a) as obvious over *Lee* in view of *Waga*.

Applicants respectfully assert that neither *Lee*, *Waga*, nor their combination suggest or make obvious, all of the elements of the present invention. *Lee* is directed to an inductor having multiple turns disposed one above another in respective metallization layers of an IC. Although

*Lee* may teach or suggest a “stacked” coil configuration, *Lee* does not teach or suggest the use of more than one ESD clamp device with the plurality of coils. *Lee* does not disclose the plurality of ESD clamps that have parasitic capacitance, as called for by claims 1 and 18 of the present invention. Therefore, *Lee* does not teach all of the elements called for by independent claims 1 and 18 of the present invention. *Waga* does not compensate for the deficit of *Lee*. As described above *Waga* does not teach or make obvious the ESD clamp called for by the claims of the present invention. *Waga* does not disclose or suggest any capacitors that may be used to anticipate the ESD clamp called for by claims 1 and 18. *Lee* does not compensate for this deficit. Therefore, the combination of *Waga* and *Lee* do not anticipate all of the elements of independent claims 1 and 18 of the present invention. Accordingly, claims 1 and 18 of the present invention is allowable.

Independent claims 1 and 18 are allowable for at least the reasons cited above. Additionally, claims 2-17 and 19-20, which depend from independent claims 1 and 18, respectively are also allowable for at least the reasons cited above.

Reconsideration of the present application is respectfully requested.

In light of the arguments presented above, Applicants respectfully assert that claims 1-20 are allowable. In light of the arguments presented above, a Notice of Allowance is respectfully solicited.

If for any reason the Examiner finds the application other than in condition for allowance, **the Examiner is requested to call the undersigned attorney** at the Houston, Texas telephone

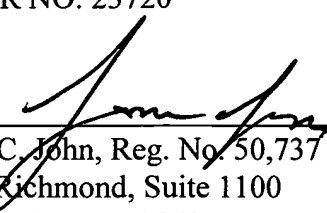
number (713) 934-4069 to discuss the steps necessary for placing the application in condition for allowance.

Respectfully submitted,

WILLIAMS, MORGAN & AMERSON, P.C.  
CUSTOMER NO. 23720

Date: October 31, 2003

By: \_\_\_\_\_

  
Jaison C. John, Reg. No. 50,737  
10333 Richmond, Suite 1100  
Houston, Texas 77042  
(713) 934-7000  
(713) 934-7011 (facsimile)  
ATTORNEY FOR APPLICANT(S)